<center>REMARKS</center>

Applicant has carefully studied the outstanding Office Action. The present amendment is intended to place the application in condition for allowance and is believed to overcome all of the objections and rejections made by the Examiner. Favorable reconsideration and allowance of the application are respectfully requested.

Applicant has amended claims 1, 5 - 23, 28 - 48, 52 - 66 and 73 – 86 to more properly claim the present invention. No new matter has been added. Claims 1 – 86 are presented for examination.

In Paragraphs 1 - 23 of the Office Action, claims 1 - 86 have been rejected under 35 U.S.C. §102(b) as being anticipated by Guedalia, U.S. Patent No. 6,121,970 ("Guedalia").

Distinctions between Claimed Invention and U.S. Patent No. 6,121,970 to Guedalia

The present invention concerns copy protection of digital images residing on a server computer and available for viewing over the Internet. Proprietary image files referenced within web pages are protected by automatically referencing substitute files, such as files containing encrypted images or watermarked images, in their stead. Specifically, as disclosed in the present specification, a web page parser 116 (FIG. 1) parses a web page in order to identify proprietary images referenced therewithin, and a web page modifier 122 replaces references to proprietary image files in the web page with references to substitute data files instead. Similarly, at step 214 (FIG. 2) a server computer, such as server computer 100, generates a modified web page wherein references to proprietary image files are replaced with references to substitute data files. Image files are recognized as being protected by a consulting a protection status database 118, or by use of special tags such as <PROTECT> and </PROTECT> within web pages. (Original specification / page 18, lines 23 – 25; page 21, lines 8 – 10)

Guedalia describes interactive viewing of a large digital photo, too large to be displayed in its entirety at full resolution on a display monitor, by dynamically designating parameters, within a web page, for a size of a viewing window and a rectangular portion of the large photo to be viewed within the viewing window. An image server receiving a request including such parameters, prepares a standard image, such as a JPEG image, scaled appropriately so that the desired rectangular portion of the large photo has pixel dimensions that match the

dimensions of the desired viewing window. As a user interactively requests different portions of an image to view, the viewing window parameters and rectangular portion parameters within the web page are successively updated and, in turn, the image server sends different images. This gives the user an experience of navigating the large digital photo by panning around in different directions and zooming in and out at different levels of magnification.

Unlike Guedalia, which involves modification of parameters within a web page after the web page is received by a client computer, in response to interactive user navigation, the present invention modifies a web page prior to the web page being received by a client computer, in order to prevent the client computer from obtaining proprietary digital image data. Moreover, using the present invention the original web page requested by a client computer is not received by the client computer; the client computer only receives a modified web page. In distinction, using the invention of Guedalia, the client computer receives the original web page requested, and thereafter the web page is modified in response to interactive client requests. I.e., the web page modification of the present invention is pro-active, whereas the modification of Guedalia is reactive.

In order to further distinguish between the present invention and Guedalia, applicant has amended independent claims 1, so as to clarify that (i) the modified web page is generated prior to responding to the client request, and (ii) the modified web page, and not the original web page, is sent in response to the client request.

The rejections of claims 1 - 86 in paragraphs 1 - 23 of the Office Action will now be dealt with specifically.

As to amended independent method claim 1, applicant respectfully submits that the limitations in claim 1 of:

"generating a modified layout page from the original layout page by replacing at least one of the references to digital image files in the original layout page with references to substitute data files, prior to responding to the client computer request"; and

"sending the modified layout page to the client computer in response to the client computer request"

are neither shown nor suggested in Guedalia.

Because claims 2 - 22 depend from claim 1 and include additional features, applicant respectfully submits that claims 2 – 22 are not anticipated or rendered obvious by Guedalia.

Accordingly claims 1 - 22 are deemed to be allowable.

As to amended independent system claim 23, applicant respectfully submits that the limitations in claim 23 of:

"a layout page generator generating a modified layout page from the original layout page by replacing at least one of the references to digital image files in the original layout page with references to substitute data, prior to responding to the client computer request"; and

"a transmitter sending the modified layout page to the client computer in response to the client computer request ",

are neither shown nor suggested in Guedalia.

Because claims 24 - 44 depend from claim 23 and include additional features, applicant respectfully submits that claims 24 - 44 are not anticipated or rendered obvious by Guedalia.

Accordingly claims 23 - 44 are deemed to be allowable.

As to amended independent method claim 45, applicant respectfully submits that the limitations in claim 45 of:

"generating a modified layout page from the original layout page by replacing at least one of the references to digital image files in the original layout page with references to substitute data, prior to responding to the client computer request"; and

"sending the modified layout page to the client computer in response to the client computer request ",

are neither shown nor suggested in Guedalia.

Because claims 46 - 65 depend from claim 45 and include additional features, applicant respectfully submits that claims 46 – 65 are not anticipated or rendered obvious by Guedalia.

Accordingly claims 45 - 65 are deemed to be allowable.

As to amended independent system claim 66, applicant respectfully submits that the limitations in claim 66 of:

"a transmitter ... sending a modified layout page to the client computer in response to the client computer request"; and

"a layout page generator generating the modified layout page from the original layout page by replacing at least one of the references to digital image files in the original layout page with references to substitute data, prior to responding to the client computer request"

are neither shown nor suggested in Guedalia.

Because claims 67 - 86 depend from claim 66 and include additional features, applicant respectfully submits that claims 67 - 86 are not anticipated or rendered obvious by Guedalia.

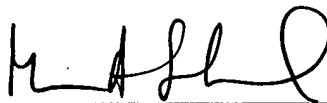Accordingly claims 66 - 86 are deemed to be allowable.

Support for Amended Claims in Original Specification

Independent claims 1, 23, 45 and 66 have been amended to include the limitation that the modified layout page is generated prior to responding to the client computer request. This limitation is described in the original specification at steps 214 and 216 of FIG. 2, which precede step 224. It is also described at page 18, lines 21 – 25, with reference to element 122 of FIG. 1.

The dependent claims have been amended to clarify that protected digital image data is stored in files and referenced as files within layout pages.

For the foregoing reasons, applicant respectfully submits that the applicable objections and rejections have been overcome and that the claims are in condition for allowance.

Respectfully submitted,

Dated: April 5 , 2004

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